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**To:** <hnavrozali@waterboards.ca.gov>  
**Date:** 3/15/05 11:29PM  
**Subject:** NPDES Permit Renewal - SONGS

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March 15, 2005

Chairman John Minan and Regional Board Members

California Regional Water Quality Control Board

9174 Sky Park Court, Suite 100

San Diego, California 92123-4340

RE: Comments on NPDES Nos. CA0108073 and CA0108181, Tentative Orders No. R9-2005-0005 and R9-2005-0006, Southern California Edison San Onofre Nuclear Generating Stations (SONGS) Units 2 and 3

Dear Chairman Minan and Board Members:

Pursuant to my testimony before the Regional Board on March 9th, I wanted to reiterate my concern about approval of the NPDES permit renewal for the San Onofre Nuclear Generating Stations (SONGS). The health of the marine ecosystem concerns me greatly and I support the recommendations of the San Diego Bay Council. As a resident of South Orange County, a beach enthusiast, and an urban planner actively involved in sustainable development, I am concerned that the discharge permit is

Not sufficiently comprehensive to inform the public of risks,  
Does not protect our region's precious water resources, and  
Does not comply with state and federal environmental laws.

Given that the region of Camp Pendleton is one of the last open stretches of wild land, and the San Mateo Creek Watershed the last free-flowing system in Southern California, particular attention should be paid to the health of this Marine Area of High Resource Value. Eight endangered species are endemic to the region, including the Southern Steelhead trout whose resurgence is almost certainly impacted by the intake at SONGS. In fact, this area should be designated an Area of Special Biological Significance and included in the Coastal Commission's Critical Coastal Area Program.

The SONGS Units 2 and 3, in combination, draw in approximately 2.4 billion gallons of seawater per day to cool the steam condensers used to generate 2,174 megawatts of total power. The steam generators often operate for up to

24 hours uninterrupted, leading to continuous impacts. The cooling water is discharged back into the ocean at a temperature 25 above the intake temperature, and the intake and discharges are clustered together in shallow coastal waters. As a result, the environmental impacts to the marine ecosystem are massive. This includes a fish mortality of between 16.5 and 45 tons per year and losses of millions of eggs and organisms.

I am not impressed by SCE's argument that they have always operated this way, so the Regional Board should continue to look the other way. I also assert that SONGS should not be allowed to streamline their permit to reduce fees, as with such a massive impact any forbearance on the part of managing agencies would be an irresponsible gift from the pockets of the people of California. It is our beach being pasteurized, our fish entrained and impinged, and SCE passes on any costs to their customers anyway. Not to mention the continuing risk to the residents of Orange and San Diego Counties from this dangerous, inefficient, and unsustainable production of electricity.

Given the sheer size and great public interest in this discharge permit, I urge the Board to defer any immediate action in the adoption of these Orders until the significant gaps in key information regarding environmental impacts are included to justify its adoption, and the public has had a chance to review that information and to provide meaningful input.

Thank you for your consideration.

Sincerely,

Jack Eidt

Wild Heritage Planners

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